

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
**TARASIK ABDELL, et al.,  
COURTNEY LEE ADAMS, et al.,  
JEFFREY PHILLIPS, et al.,  
NIKOLAS SIKELIANOS,  
KAITLYN TIKKUN,**

**05 CV 8453 (RJS)(JCF)  
05 CV 9484 (RJS)(JCF)  
05 CV 7624 (RJS)(JCF)  
05 CV 7673 (RJS)(JCF)  
05 CV 9901 (RJS)(JCF)**

**Plaintiffs,**

**-versus-**

**THE CITY OF NEW YORK, et al.**

**(Filed Via ECF)**

**Defendants.**  
-----X

**NOTICE OF FILING UNDER SEAL**

**PLEASE TAKE NOTICE** that defendant the City of New York requests that the following documents submitted by defendants in relation to their opposition to certain plaintiffs' Rule 72 objections to six orders of Magistrate Judge James C. Francis IV be filed with the Clerk of Court of the Southern District of New York under seal:

1. Defendants' March 6, 2008, consolidated memorandum of law in opposition to the Rule 72 objections of plaintiffs Katherine Poe and Devon Rueckner (in Abdell), Christina Argyos, Jaie Bosse, Gabriel Cohn, Naimah Fowler, David Geocos, Michael Gindi, Zachary Goldstein, Richard Lovejoy, Sarah Palmer, Jeffrey Parrott, Robert Ponce, Dana Pryor, Ellen Tuzzolo, David Zalk, Lisa Martin, Chris Agnese, and James Graham (in Adams), Rafael Porto and Joel Miller (in Phillips), Nikolas Sikelianos (in Sikelianos), and Kaitlyn Tikkun (in the Tikkun) (collectively, "Plaintiffs" and "Plaintiffs' Objections"); and

2. The March 6, 2008, declaration of Jeffrey A. Dougherty in support of defendants' consolidated memorandum of law.

These documents have been served upon counsel for plaintiffs. Defendants were granted permission to file these documents under seal in an order entered by United States District Judge Richard J. Sullivan dated February 6, 2008, pursuant to Protective Order #1 filed in the consolidated RNC cases on October 6, 2005. Accordingly, defendants respectfully request that these documents be withheld from the official public record maintained by the Clerk of Court in this case.

Dated: New York, New York  
July 16, 2008

MICHAEL A. CARDOZO  
Corporation Counsel of the City of New York  
Attorney for Defendant City of New York,  
100 Church Street, Room 3-126  
New York, New York 10007  
212-788-8342

By: \_\_\_\_\_/s/\_\_\_\_\_

JEFFREY A. DOUGHERTY

Index No. 05 CV 8453 (RJS) (JCF)  
 Index No. 05 CV 9484 (RJS) (JCF)  
 Index No. 05 CV 7624 (RJS) (JCF)  
 Index No. 05 CV 7673 (RJS) (JCF)  
 Index No. 05 CV 9901 (RJS) (JCF)

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

TARASIK ABDELL, *et al.*,  
 COURTNEY LEE ADAMS, *et al.*,  
 JEFFREY PHILLIPS, *et al.*,  
 NIKOLAS SIKELIANOS,  
 KAITLYN TIKKUN,  
 Plaintiffs,  
 -against-  
 The CITY OF NEW YORK, *et al.*;  
 Defendants.

**NOTICE OF FILING UNDER SEAL**

**MICHAEL A. CARDOZO**  
*Corporation Counsel of the City of New York*  
 Attorney for Defendant the City of New York  
 100 Church Street  
 New York, N.Y. 10007  
*Of Counsel: Jeffrey A. Dougherty*  
*Tel: 212-788-8342*

*Due and timely service is hereby admitted.*

*New York, N.Y. .... July 16, 2008*

*..... Esq.*

*Attorney for Defendants.....*

**CONFIDENTIAL**

This envelope contains documents or information designated confidential pursuant to an order entered by the United States District Court for the Southern District of New York in the above-captioned action. This envelope shall not be opened or unsealed without the express direction of a judge of this Court, and its contents shall not be displayed or revealed except as the Court may order. This envelope and its contents shall at all times be maintained separate and apart from the publicly available files of this case.